REMARKS

This paper is filed in response to the office action mailed on June 24, 2004.

Consideration of the information disclosure statements filed on November 11, 2002 and May 10, 2004 is acknowledged and appreciated.

Claims 9 and 27 have been canceled and claims 1, 10-12, 19-20, 22, 30 and 33-36 have been amended; claims 1-8, 10-26 and 28-31 remain pending.

Turning to the rejections based upon the prior art, all claims stand rejected under 35 U.S.C. § 103 as being unpatentable over the hypothetical combination of U.S. Patent No. 6,717,513 ("Sandelman") and U.S. Patent No. 6,192,281 ("Brown") or a combination of Sandelman, Brown and U.S. Patent No. 5,521,842 ("Yamada").

In response, independent claims 1, 12, 22 and 30 have all been amended to traverse these rejections.

At the outset, under MPEP §§ 2142 and 2143,

> [t]o establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure.

Citing, In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991); *see also* MPEP § 2143-§ 2143.03 for decisions pertinent to each of these criteria.

Applicant respectfully submits that no hypothetical combination of Sandelman, Brown and Yamada establish a *prima facie* case of obviousness of independent claims 1, 12, 22 and 30 for the following reasons. Specifically, each independent claim requires the receipt of a first device alarm message that includes a first set of device information and the appending of a second set of device information in the form of message fields to the first device alarm message to form an enhanced alarm message. Then, each pending independent claim requires a mapping operation against a device alarm table to abstract contextual alarm information and the subsequent display of that contextual alarm information. No combination of Sandelman, Yamada and Brown teaches or suggest the

method of claim 1, the processor system of claim 12, the processing system of claim 22 or the system for processing of claim 30, which require these common features.

Specifically, the base reference, Sandelman, does not teach or suggest the addition or appending of a second set of message fields to a first set of message for purposes of enhancing the ability of a user to interpret the message fields. Sandelman is simply directed toward the monitoring of heating, ventilating and air conditioning equipment located at a remote site. Sandelman is not directed toward a manufacturing system which would include a plurality of field devices each adapted to generate a wide variety of alarm messages. Sandelman is primarily directed toward the detection and sending of alarms relating to device failure.

The Patent Office takes the position that column 7, line 7 of Sandelman describes the sending of a first message while column 14, lines 37-47 of Sandelman describes the sending of a second or appended message. However, column 14, lines 37-47 is merely directed toward the use of the device message delivery table 720 which, as shown in Figs. 12 and 15 is directed toward the delivery of messages, not the enhancing of messages with contextual information that can help an operator understand and solve a problem.

The Patent Office then takes the position that column 13, lines 34-63 of Sandelman discloses the claimed mapping function. However, this passage merely describes the function of converting the messages generated to a format suitable for email, fax, pagers or voicemail systems. Column 13, lines 34-63 teaches nothing about the translation of manufacturing field devices which may generate alarm messages of extremely different categories into contextual messages for display at a workstation or for use by an operator. Sandelman teaches nothing about the translation of cryptic Fieldbus protocol for use by an equipment operator to help an operator understand and solve a problem.

While Brown discloses the use of Fieldbus protocols for communications, Brown teaches nothing about the translation of Fieldbus protocols. Further, because Sandelman is only directed toward the monitoring air conditioners, boilers, ventilation motors and heaters, no reading of Sandelman would suggest to one of ordinary skill in the art of the need to translate Fieldbus protocols for display at remote workstations. Brown does not teach or suggest the enhancement or translation of Fieldbus protocol. Column 13, lines 34-63 of Sandelman merely teaches a reformatting of a message for email, fax, pagers or voicemails. There is no contextual enhancement taught or suggested by either Sandelman or Brown.

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Accordingly, no combination of Sandelman or Brown teaches or suggests all of the claim limitations of independent claims 1, 12, 22 and 30 and there is no suggestion or motivation in either Sandelman or Brown to modify either of these references to provide the enhancement and contextual alarm messages recited in independent claims 1, 12, 22 and 30. Accordingly, the obviousness rejections based upon Sandelman and Brown fail to establish a *prima facie* case of obviousness under §§ 2142 and 2143 for at least these two reasons. Accordingly, applicant respectfully submits that the rejection of claims 1-6, 8, 10-16, 18-26, 28-33 and 35-38 as being obvious in view of Sandelman and Brown is improper and should be withdrawn.

Finally, turning to the rejection of claims 7, 17 and 34 as being obvious in view of Sandelman, Brown and Yamada, applicant respectfully submits that Yamada only teaches the identifying of corrective action information, and in no way teaches or suggests the translation, enhancement and display of contextual alarm information recited in independent claims 1, 12, 22 and 30. Accordingly, Yamada in no way supplements the deficiencies of the hypothetical combination of Sandelman and Brown as set forth above. Accordingly, applicant respectfully submits that the obviousness rejection of claim 7, 17 and 34 does not meet the standards of §§ 2142 and 2143 for the reasons set forth above.

An early action indicating the allowability of this patent application is earnestly solicited. Applicants believe that no fees are due in connection with this application. However, if any fees are due, the Patent Office is authorized to deduct said fees from Deposit Account No. 13-2855.

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Respectfully submitted,

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